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December 15, 2023

VIA ECF
The Honorable Paul A. Crotty
United States Courthouse
500 Pearl Street
New York, NY 10007

Re: *Knight First Amendment Institute at Columbia University v. U.S. Department of State, No. 23 Civ. 02513 (PAC)*

Dear Judge Crotty,

We write on behalf of all parties to provide a status update in the above referenced Freedom of Information Act (“FOIA”) matter.

As the parties advised in their last status report on September 28, 2023, ECF No. 17, the State Department has completed its search for records potentially responsive to Plaintiff’s FOIA Request and identified approximately 216 potentially responsive records, including 16 Excel files. These documents are estimated to total 194,189 pages¹ or 1,633 pages excluding the Excel files.

Since the last status update, the State Department has sent Plaintiff the following release letters:

October 20, 2023 — the State Department advised that it had processed 620 pages of potentially responsive material, and had not identified any records responsive to the FOIA request.

December 8, 2023 — the State Department advised that it had processed 30 pages of potentially responsive material, and determined

¹ Due to the manner in which the software counts pages of Excel files, the number of estimated pages for the Excel files may be significantly greater than the actual page count. The parties are exploring ways to limit the number of pages from the potentially responsive Excel files, which make up the vast majority of the overall page estimate.

that 13 of these pages are non-responsive. The State Department further advised that 17 pages require external consultation before a release determination can be made.²

The State Department will continue processing records and making rolling productions every six weeks. The State Department has indicated that it has 36 pages of material remaining to be processed.

The State Department has informed Plaintiff that it will re-review some of the previously reviewed records that were deemed non-responsive. The parties intend to meet on December 21, 2023 to discuss certain aspects of Plaintiff's request to help inform the State Department's re-review.

The parties respectfully request to submit their next joint status report to the Court on February 2, 2024.

* * *

I thank the Court for its attention to this matter.

/s/ Jennifer Jones

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² The Department inadvertently indicted that 17 pages require external consultation. Actually, 20 pages were sent for external review.